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UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF UTAH	
In Re:  Chad Edward Cook Melissa Jean Cook  Debtor(s).	Case No. 23-25154  Chapter 13  Hon. Peggy Hunt
<b>DEBTOR'S MOTION TO ABATE PLAN PAYMENTS</b>	

COMES NOW Debtor, by and through counsel of record, and hereby request an abatement of plan payments. Debtor states the following in support of their motion:

1. Debtors filed this bankruptcy petition on November 9, 2023 to stop creditor collection proceedings.
2. Debtors made a partial payment in December because the original plan proposed a payment that was significantly higher than the Debtors' disposable monthly income.
3. Debtors were unable to make the payment that was listed in error and made a partial payment.
4. The plan modification was filed to lower the payment according to the debtors' disposable monthly income.
5. The total delinquent amount of plan payments is currently \$800.00.
6. Debtors requests an order to abate plan payments in the amount of \$800.00.

7. The abatement requested does not require an increase in Debtors' monthly plan payment amount.

WHEREFORE, Debtor respectfully requests that this Court GRANT an abatement of plan payments in the amount of \$800.00 and requests attorney fees in the amount of up to \$800.00.

Dated this March 22, 2024.

/s/

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Steven M. Rogers  
Attorney for Debtors

**CERTIFICATE OF SERVICE – BY NOTICE OF ELECTRONIC FILING (CM/ECF)**

I hereby certify that on **March 22, 2024** I electronically filed the foregoing Debtor's Motion to Abate Plan Payments with the United States Bankruptcy Court for the District of Utah by using the CM/ECF system. I further certify that the parties of record in this case, as identified below, are registered CM/ECF users and will be served through the CM/ECF system.

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**CERTIFICATE OF SERVICE – MAIL, OTHER**

I hereby certify that on **March 22, 2024** I caused to be served a true and correct copy of the foregoing Debtor's Motion to Dismiss and Motion to Abate Plan Payments as follows:

**Mail Service - By regular first class United States mail, postage fully pre-paid, addressed to:**  
**-NONE-**

**Mail Service to Entire Matrix – By regular first class United States mail, postage fully pre-paid, addressed to all parties who did not receive electronic service as set forth herein listed on the Official Court Mailing Matrix dated March 22, 2024 attached hereto.**

*Attached Matrix*

\_\_\_\_\_/s/

Bella Washburn

Paralegal